

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL SKIDMORE, as Trustee for the	:	
RANDY CRAIG WOLFE TRUST,	:	
	:	No. 14-cv-3089
Plaintiff	:	
	:	
v.	:	
	:	
LED ZEPPELIN, JAMES PATRICK	:	
PAGE, ROBERT ANTHONY PLANT,	:	
JOHN PAUL JONES, SUPER HYPE	:	
PUBLISHING, INC., WARNER MUSIC	:	
GROUP CORP.	:	
	:	
Parent of:	:	
	:	
WARNER/CHAPPELL MUSIC, INC.,	:	
ATLANTIC RECORDING	:	
CORPORATION, RHINO	:	
ENTERTAINMENT COMPANY,	:	
	:	
Defendants	:	

**MOTION OF DEFENDANTS JAMES PATRICK PAGE, ROBERT
ANTHONY PLANT AND JOHN PAUL JONES TO DISMISS OR TRANSFER**

Defendants James Patrick Page, Robert Anthony Plant, and John Paul Jones,¹ by and through their undersigned counsel, and in accordance with Federal Rule of Civil Procedure 12(b)(2) and (3), move for an Order dismissing them from this action for lack of personal jurisdiction and improper venue, or in the alternative an Order transferring the action to the United States District Court for the Central District of California, Western Division.

In support of their motion, the foregoing defendants rely upon the attached Memorandum of Law and accompanying Declarations, the concurrently-filed Request for Judicial Notice and the Memorandum of Law and Declarations submitted by defendants Super Hype Publishing, Inc., Warner Music Group Corp., Warner/Chappell Music, Inc., Atlantic Recording Corporation and Rhino Entertainment Company in support of their concurrently-filed motion.

Respectfully submitted,

FOX ROTHSCHILD LLP

/s/ Michael Eidel

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Local Counsel for Defendants

Dated: September 17, 2014

PHILIPS NIZER LLP

/s/ Helene Freeman

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*Attorneys for the Individual Defendants
Admitted Pro Hac Vice*

¹ These defendants, along with the late John Bonham, performed as Led Zeppelin. Plaintiff purports to name Led Zeppelin as an additional defendant, but that is the name of a musical group and not a juridical entity capable of suing or being sued.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing motion of Defendants James Patrick Page, Robert Anthony Plant and John Paul Jones to Dismiss or Transfer and Memorandum of Law and Declarations of James Patrick Page, Robert Anthony Plant, and John Paul Jones in support thereof, were served upon counsel for Plaintiff via the Court's ECF filing system.

/s/ Matthew S. Olesh
Matthew S. Olesh, Esquire

Dated: September 17, 2014